

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: BAIR HUGGER FORCED AIR
WARMING PRODUCTS LIABILITY
LITIGATION

MDL No. 15-2666
(JNE/FLN)

WORD COUNT COMPLIANCE

This Document Relates To: All Actions

I certify that Plaintiffs' Memorandum in Support of Motion to Overrule VitaHEAT Medical, LLC's Relevancy Objection to Subpoena complies with the length limitations set forth in LR 7.1(f) and the type size requirements set forth in LR 7.1(h). I further certify that in preparation of this memorandum, I used Microsoft Office Word 2013, which has an appropriately functioning word count tool applied to include all text, including headings, footnotes, and quotations. The aforementioned memorandum contains 4,399 words.

Dated: February 9, 2017

CIRESI CONLIN L.L.P.

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